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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DIAMOND RESORTS INTERNATIONAL, INC., a)	Case No.: 2:17-cv-03007-APG-VCF
Delaware corporation; DIAMOND RESORTS)	
CORPORATION, a Maryland corporation;)	
DIAMOND RESORTS U.S. COLLECTION)	
DEVELOPMENT, LLC, a Delaware limited liability)	STIPULATION AND ORDER TO
company; and DIAMOND RESORTS)	EXTEND TIME TO FILE
MANAGEMENT, INC., an Arizona corporation,)	RESPONSE TO AMENDED
)	COMPLAINT [ECF NO. 59]
Plaintiffs,)	
)	(SECOND REQUEST)
vs.)	
)	
REED HEIN & ASSOCIATES, LLC, d/b/a)	
TIMESHARE EXIT TEAM, a Washington limited)	
liability company; BRANDON REED, an individual)	
and citizen of the State of Washington; TREVOR)	
HEIN, an individual and citizen of Canada;)	
THOMAS PARENTEAU, an individual and citizen)	
of the State of Washington; HAPPY HOUR MEDIA)	
GROUP, LLC, a Washington limited liability)	
company; MITCHELL REED SUSSMAN, ESQ.)	
d/b/a THE LAW OFFICES OF MITCHELL REED)	
SUSSMAN & ASSOCIATES, an individual citizen)	
of the State of California; SCHROETER,)	
GOLDMARK & BENDER, P.S. A Washington)	
professional services corporation; and KEN B.)	
PRIVETT, ESQ., a citizen of Oklahoma,)	
)	
Defendants.)	
)	

**STIPULATION AND ORDER TO EXTEND TIME TO FILE RESPONSE
TO AMENDED COMPLAINT [ECF NO. 59] (SECOND REQUEST)**

Pursuant to Local Rules 6-1 and 7-1, Plaintiffs DIAMOND RESORTS INTERNATIONAL, INC.; DIAMOND RESORTS CORPORATION; DIAMOND RESORTS U.S. COLLECTION DEVELOPMENT, LLC; and DIAMOND RESORTS MANAGEMENT, INC., (“Plaintiffs”), and Defendants REED HEIN & ASSOCIATES, LLC d/b/a TIMESHARE EXIT TEAM; BRANDON REED; and TREVOR HEIN (“Reed Hein Defendants”), by and through their respective attorneys of record, stipulate as follows:

STIPULATION

1. Plaintiffs filed their Complaint on December 6, 2017 [ECF No. 1].
2. The Reed Hein Defendants filed a motion to dismiss. [ECF No. 22].
3. The Court dismissed certain claims and the individual defendants from the lawsuit and allowed Plaintiffs to file an amended complaint. [ECF No. 50].
4. Plaintiffs filed their Amended Complaint for Damages and Injunctive Relief (“Amended Complaint”) on January 4, 2019 [ECF No. 59].
5. The Amended Complaint is 50 pages long with 232 separate paragraphs of allegations, nearly 100 more than the Complaint.
6. The Amended Complaint adds 7 defendants, 5 of whom were never previously part of the litigation.
7. The Amended Complaint also includes 7 causes of action including 3 new causes of action which were not part of the original Complaint.
8. The Amended Complaint in this case involves complex business tort, unfair business practices, and false advertising.
9. The parties previously agreed to an extension of time for Reed Hein Defendants to respond to the Amended Complaint until February 19, 2019. [ECF No. 71].
10. Unfortunately, the undersigned counsel was recently involved in an accident and has been out of the office for medical treatment. Therefore, counsel needs another short extension to allow them to fully review and respond to the allegations in the Amended

Complaint.

11. The Reed Hein Defendants request an additional nine (9) days to file their responses to the Amended Complaint, or until February 28, 2019.

12. The undersigned counsel also represents Happy Hour Media Group, LLC. Happy Hour's response is currently due on February 28, 2019. [ECF No. 73]. The requested extension will make the response due on the same date as the response for Happy Hour Media Group, LLC.

13. Plaintiffs' do not oppose the extension.

14. This stipulation is not made for purposes of delay.

15. Because new parties are being added to the litigation, any extension will have minimal impact on timing as those parties will need to time respond to the complaint as well.

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16. Therefore, the parties agree that the Reed Hein Defendants' respective responses to the Complaint are now due on or before February 28, 2019.

DATED: February 15, 2019.

DATED: February 15, 2019.

GORDON REES SCULLY MANSUKHANI, LLP

COOPER LEVENSON, P.A.

/s/ David T. Gluth

/s/ Daniel J. Barsky

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ORDER

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: 2-19-2019